



WESTSHORE CENTRAL DISPATCH

2900 Center Ridge Rd
Westlake, Ohio 44145

Phone 440.827.5500
Fax 440.827.5106

February 24, 2012
Federal Communications Commission
Public Safety & Homeland Security Branch
Gettysburg, PA 17325
Attention: Licensing Branch:

Request for Waiver of Rule 47 CFR 1.931

To whom it may concern:

The Westshore Central Dispatch Center (Westcom, FRN 0015113186) is a consolidated public safety dispatch center in Westlake, Ohio providing 9-1-1 answering and dispatch services to public safety agencies in the cities of Bay Village, Fairview Park, Rocky River, Westlake and North Ridgeville in western Cuyahoga County and eastern Lorain County, Ohio.

To improve our day-to-day operations and to enhance regional interoperability, we want to join the new digital 700 MHz P-25 radio system that has been built for Cuyahoga County agencies.

For operational efficiency and to negate the need of carrying two portable radios, we are in need of "in-band" talk-around, fire ground and mobile vehicular repeater (MVR) frequencies. Talk-around or Fire ground channels are necessary for the safety of both the public and our first responder personnel due to nature of building construction.

Our portable radios will accommodate both the 700 and 800 MHz band; therefore, we are seeking Special Temporary Authority (STA) to test the feasibility of this concept.

The Region 33 (Ohio) Regional Planning Committee (RPC) has researched this matter and has determined that low end NPSPAC 800 MHz frequencies would be best suited for this purpose because the upper frequencies are quite crowded in this large metropolitan area.

We understand channels 602 through 635 of the 800 MHz band are Canadian Primary however, the RPC has researched the Industry Canada 800 MHz data base and found four frequencies that have no users in the Ontario area across Lake Erie from our location and one frequency that has users in Toronto, Ontario, a distance estimated at more than 200 miles away.

Further research by the RPC finds the Commission has previously granted authorizations for various Michigan entities close to or adjacent to Canada for much higher powered base stations on Canadian Primary frequencies on a "Secondary Use" basis (WQEH218, WQBM334, WQED531, others)

Given the fact that the frequencies we are seeking will have MVR and portable radio ERP's of 2 watts or less, any Canadian interference in either direction is highly unlikely. However, we will abide by the standard "Secondary Use" caveats, i.e. accept any Canadian interference and cease operation if we cause harmful interference to any Canadian station.

Original NPSPAC frequencies are being sought because Ohio (Wave 4) has not yet rebanded and the new NPSPAC frequencies have not been cleared of incumbent users. Westcom will move to the new NPSPAC frequencies when they become available. We will not ask Sprint to pay for this frequency change.

Westcom hopes the Commission will look favorably on this reasoning and grant the requested STA so we may begin operations on this new radio system to enhance the safety of the public in our area of responsibility. It is most definitely in the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick L. Pishnery", with a stylized, flowing script.

Nick L. Pishnery
Supervisor, Westshore Central Dispatch Center
27700 Hilliard Blvd.
Westlake, Ohio 44145-3030
440-827-5500
e-mail npishnery@cityofwestlake.org